

FEB 03 2012

**IN THE CIRCUIT COURT OF BOONE COUNTY, MISSOURI**

CHRISTY BLAKEMORE  
CLERK, CIRCUIT COURT  
COLUMBIA, MO.

STATE OF MISSOURI

Plaintiff,

v.

DOCX, LLC,

a Georgia corporation

Registered Agent:

CT Corporation System

1201 Peachtree Street, NE

Atlanta, Georgia 30361

Defendant.

Case No. 12BA-CR 00433  
OCN:

**INDICTMENT**

**COUNT 1**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about April 21, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009010022, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 2**

False Declaration – Class B misdemeanor

Mo. Charge Code: 2910199.0

NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about April 21, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009010022, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009010022 was found not to have signed Deed of Release 2009010022 before the notary public identified in Deed of Release 2009010022. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 3**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about July 7, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009018568, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 4**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about July 7, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in

the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009018568, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009018568 was found not to have signed Deed of Release 2009018568 before the notary public identified in Deed of Release 2009018568. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 5**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about July 28, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009020598, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a



high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 6**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about July 28, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009020598, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009020598 was found not to have signed Deed of Release 2009020598 before the notary public identified in Deed of Release 2009020598. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 7**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about July 28, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009020599, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 8**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about July 28, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public

servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009020599, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009020599 was found not to have signed Deed of Release 2009020599 before the notary public identified in Deed of Release 2009020599. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 9**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about July 28, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009020600, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 10**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about July 28, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009020600, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009020600 was found not to have signed Deed of Release 2009020600 before the notary public identified in Deed of Release 2009020600. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 11**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about July 28, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009020601, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 12**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about July 28, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public

servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009020601, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009020601 was found not to have signed Deed of Release 2009020601 before the notary public identified in Deed of Release 2009020601. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 13**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about July 28, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009020602, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 14**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about July 28, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009020602, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009020602 was found not to have signed Deed of Release 2009020602 before the notary public identified in Deed of Release 2009020602. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 15**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about July 28, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009020603, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 16**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about July 28, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public



servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009020603, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009020603 was found not to have signed Deed of Release 2009020603 before the notary public identified in Deed of Release 2009020603. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 17**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about July 28, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009020604, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 18**

False Declaration—Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about July 28, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009020604, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009020604 was found not to have signed Deed of Release 2009020604 before the notary public identified in Deed of Release 2009020604. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 19**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about July 31, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009020911, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 20**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about July 31, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public

servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009020911, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009020911 was found not to have signed Deed of Release 2009020911 before the notary public identified in Deed of Release 2009020911. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 21**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about June 1, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009014386, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 22**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about June 1, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009014386, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009014386 was found not to have signed Deed of Release 2009014386 before the notary public identified in Deed of Release 2009014386. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 23**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about June 1, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009014387, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 24**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about June 1, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public

servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009014387, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009014387 was found not to have signed Deed of Release 2009014387 before the notary public identified in Deed of Release 2009014387. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 25**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about June 1, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009014388, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 26**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about June 1, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009014388, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009014388 was found not to have signed Deed of Release 2009014388 before the notary public identified in Deed of Release 2009014388. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.



### **COUNT 27**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about June 1, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009014389, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 28**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about June 1, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public

servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009014389, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009014389 was found not to have signed Deed of Release 2009014389 before the notary public identified in Deed of Release 2009014389. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 29**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about June 1, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009014390, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 30**

False Declaration – Class B misdemeanor

Mo. Charge Code: 2910199.0

NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about June 1, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009014390, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009014390 was found not to have signed Deed of Release 2009014390 before the notary public identified in Deed of Release 2009014390. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 31**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about June 1, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009014394, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 32**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about June 1, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public

servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009014394, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009014394 was found not to have signed Deed of Release 2009014394 before the notary public identified in Deed of Release 2009014394. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 33**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about June 3, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009014719, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 34**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about June 3, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009014719, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009014719 was found not to have signed Deed of Release 2009014719 before the notary public identified in Deed of Release 2009014719. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 35**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about June 3, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009014720, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 36**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about June 3, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public

servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009014720, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009014720 was found not to have signed Deed of Release 2009014720 before the notary public identified in Deed of Release 2009014720. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 37**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about June 15, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009015916, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a



high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 38**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about June 15, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009015916, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009015916 was found not to have signed Deed of Release 2009015916 before the notary public identified in Deed of Release 2009015916. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 39**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about July 7, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009018566, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 40**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about July 7, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in

the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009018566, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009018566 was found not to have signed Deed of Release 2009018566 before the notary public identified in Deed of Release 2009018566. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 41**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about July 7, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009018567, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 42**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about July 7, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009018567, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009018567 was found not to have signed Deed of Release 2009018567 before the notary public identified in Deed of Release 2009018567. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 43**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about July 14, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009019232, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 44**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about July 14, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public

servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009019232, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011; when the purported signer of Deed of Release 2009019232 was found not to have signed Deed of Release 2009019232 before the notary public identified in Deed of Release 2009019232. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 45**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about July 21, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009019970, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 46**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about July 21, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009019970, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009019970 was found not to have signed Deed of Release 2009019970 before the notary public identified in Deed of Release 2009019970. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 47**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about August 25, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009023094, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 48**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about August 25, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a



public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009023094, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009023094 was found not to have signed Deed of Release 2009023094 before the notary public identified in Deed of Release 2009023094. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 49**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about August 25, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009023095, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 50**

- False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about August 25, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009023095, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009023095 was found not to have signed Deed of Release 2009023095 before the notary public identified in Deed of Release 2009023095. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 51**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about August 25, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009023096, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 52**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about August 25, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a

public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009023096, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009023096 was found not to have signed Deed of Release 2009023096 before the notary public identified in Deed of Release 2009023096. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 53**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about April 28, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009010725, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 54**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about April 28, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009010725, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009010725 was found not to have signed Deed of Release 2009010725 before the notary public identified in Deed of Release 2009010725. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 55**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about April 28, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009010726, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 56**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about April 28, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public

servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009010726, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009010726 was found not to have signed Deed of Release 2009010726 before the notary public identified in Deed of Release 2009010726. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 57**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about April 28, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009010727, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 58**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about April 28, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009010727, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009010727 was found not to have signed Deed of Release 2009010727 before the notary public identified in Deed of Release 2009010727. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.



### **COUNT 59**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about April 28, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009010728, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 60**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about April 28, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public

servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009010728, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009010728 was found not to have signed Deed of Release 2009010728 before the notary public identified in Deed of Release 2009010728. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 61**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about May 11, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009012041, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 62**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about May 11, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009012041, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009012041 was found not to have signed Deed of Release 2009012041 before the notary public identified in Deed of Release 2009012041. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 63**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about May 19, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009013007, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 64**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about May 19, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public

servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009013007, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009013007 was found not to have signed Deed of Release 2009013007 before the notary public identified in Deed of Release 2009013007. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 65**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about June 23, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009017022, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 66**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about June 23, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009017022, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009017022 was found not to have signed Deed of Release 2009017022 before the notary public identified in Deed of Release 2009017022. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 67**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about June 23, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009017028, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 68**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about June 23, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public

servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009017028, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009017028 was found not to have signed Deed of Release 2009017028 before the notary public identified in Deed of Release 2009017028. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 69**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about June 23, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009017029, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a



high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 70**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about June 23, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009017029, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009017029 was found not to have signed Deed of Release 2009017029 before the notary public identified in Deed of Release 2009017029. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 71**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about June 26, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009017438, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 72**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about June 26, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public

servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009017438, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009017438 was found not to have signed Deed of Release 2009017438 before the notary public identified in Deed of Release 2009017438. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 73**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about June 26, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009017439, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 74**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about June 26, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009017439, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009017439 was found not to have signed Deed of Release 2009017439 before the notary public identified in Deed of Release 2009017439. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 75**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about June 26, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009017440, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 76**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about June 26, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public

servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009017440, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009017440 was found not to have signed Deed of Release 2009017440 before the notary public identified in Deed of Release 2009017440. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 77**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about June 30, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009017814, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 78**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about June 30, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009017814, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009017814 was found not to have signed Deed of Release 2009017814 before the notary public identified in Deed of Release 2009017814. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 79**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about July 20, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009019809, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 80**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about July 20, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public



servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009019809, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009019809 was found not to have signed Deed of Release 2009019809 before the notary public identified in Deed of Release 2009019809. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 81**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about July 20, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009019810, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 82**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about July 20, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009019810, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009019810 was found not to have signed Deed of Release 2009019810 before the notary public identified in Deed of Release 2009019810. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 83**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about July 20, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009019811, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 84**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about July 20, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public

servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009019811, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009019811 was found not to have signed Deed of Release 2009019811 before the notary public identified in Deed of Release 2009019811. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 85**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about July 20, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009019812, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 86**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about July 20, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009019812, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009019812 was found not to have signed Deed of Release 2009019812 before the notary public identified in Deed of Release 2009019812. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 87**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about July 20, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009019813, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 88**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about July 20, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public

servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009019813, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009019813 was found not to have signed Deed of Release 2009019813 before the notary public identified in Deed of Release 2009019813. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 89**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about July 20, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009019814, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 90**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about July 20, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009019814, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009019814 was found not to have signed Deed of Release 2009019814 before the notary public identified in Deed of Release 2009019814. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.



### **COUNT 91**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about July 21, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009019968, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 92**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about July 21, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public

servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009019968, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009019968 was found not to have signed Deed of Release 2009019968 before the notary public identified in Deed of Release 2009019968. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 93**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about July 21, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009019969, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 94**

False Declaration – Class B misdemeanor

Mo. Charge Code: 2910199.0

NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about July 21, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009019969, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009019969 was found not to have signed Deed of Release 2009019969 before the notary public identified in Deed of Release 2009019969. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 95**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about August 3, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009021215, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 96**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about August 3, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a

public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009021215, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009021215 was found not to have signed Deed of Release 2009021215 before the notary public identified in Deed of Release 2009021215. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 97**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about August 3, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009021216, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 98**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about August 3, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009021216, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009021216 was found not to have signed Deed of Release 2009021216 before the notary public identified in Deed of Release 2009021216. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 99**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about August 3, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009021217, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 100**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about August 3, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a

public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009021217, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009021217 was found not to have signed Deed of Release 2009021217 before the notary public identified in Deed of Release 2009021217. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 101**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about August 11, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009021863, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a



high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 102**

False Declaration – Class B misdemeanor

Mo. Charge Code: 2910199.0

NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about August 11, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009021863, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009021863 was found not to have signed Deed of Release 2009021863 before the notary public identified in Deed of Release 2009021863. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 103**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about August 11, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009021864, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 104**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about August 11, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a

public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009021864, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009021864 was found not to have signed Deed of Release 2009021864 before the notary public identified in Deed of Release 2009021864. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 105**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about August 11, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009021868, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 106**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about August 11, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009021868, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009021868 was found not to have signed Deed of Release 2009021868 before the notary public identified in Deed of Release 2009021868. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 107**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about August 11, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009021869, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 108**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about August 11, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a

public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009021869, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009021869 was found not to have signed Deed of Release 2009021869 before the notary public identified in Deed of Release 2009021869. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 109**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about August 11, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009021870, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 110**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about August 11, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009021870, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009021870 was found not to have signed Deed of Release 2009021870 before the notary public identified in Deed of Release 2009021870. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 111**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about August 11, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009021871, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 112**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about August 11, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a



public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009021871, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009021871 was found not to have signed Deed of Release 2009021871 before the notary public identified in Deed of Release 2009021871. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 113**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about August 25, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009023097, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 114**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about August 25, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009023097, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009023097 was found not to have signed Deed of Release 2009023097 before the notary public identified in Deed of Release 2009023097. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 115**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about August 25, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009023098, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 116**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about August 25, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a

public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009023098, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009023098 was found not to have signed Deed of Release 2009023098 before the notary public identified in Deed of Release 2009023098. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 117**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about September 1, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009023632, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 118**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about September 1, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009023632, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009023632 was found not to have signed Deed of Release 2009023632 before the notary public identified in Deed of Release 2009023632. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 119**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about September 21, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009024997, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 120**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about September 21, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a

public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009024997, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009024997 was found not to have signed Deed of Release 2009024997 before the notary public identified in Deed of Release 2009024997. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 121**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about September 21, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009024998, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 122**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about September 21, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009024998, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009024998 was found not to have signed Deed of Release 2009024998 before the notary public identified in Deed of Release 2009024998. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.



### **COUNT 123**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about September 21, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009024999, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 124**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about September 21, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a

public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009024999, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009024999 was found not to have signed Deed of Release 2009024999 before the notary public identified in Deed of Release 2009024999. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 125**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about October 5, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009026052, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 126**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about October 5, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009026052, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009026052 was found not to have signed Deed of Release 2009026052 before the notary public identified in Deed of Release 2009026052. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 127**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about October 5, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009026053, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 128**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about October 5, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a

public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009026053, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009026053 was found not to have signed Deed of Release 2009026053 before the notary public identified in Deed of Release 2009026053. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

#### **COUNT 129**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about October 5, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009026054, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a

high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 130**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about October 5, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009026054, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009026054 was found not to have signed Deed of Release 2009026054 before the notary public identified in Deed of Release 2009026054. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 131**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about October 5, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009026055, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 132**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about October 5, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a

public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009026055, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009026055 was found not to have signed Deed of Release 2009026055 before the notary public identified in Deed of Release 2009026055. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 133**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about October 19, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009026958, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a



high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

**COUNT 134**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about October 19, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009026958, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009026958 was found not to have signed Deed of Release 2009026958 before the notary public identified in Deed of Release 2009026958. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 135**

Forgery – Class C Felony  
Mo. Charge Code: 1801089.0  
NCIC Code: 2589

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 570.090 RSMo, committed the class C felony of forgery, punishable upon conviction under section 560.021, RSMo, in that on or about June 3, 2009, in the County of Boone, State of Missouri, Defendant, acting knowingly in concert with its employees, with the purpose to defraud, used as genuine or transferred with the knowledge or belief that it would be used as genuine, a writing, namely Deed of Release number 2009014721, knowing that it had been made or authenticated so that it purported to have been made by another, or that it had been made so that it purported to have been made by authority of one who did not give such authority. Defendant is liable under section 562.056(1)(3) RSMo because the conduct constituting the offense was engaged in, authorized, solicited, requested, commanded or knowingly tolerated by a high managerial agent acting within the scope of the agent's employment and in behalf of the corporation.

### **COUNT 136**

False Declaration – Class B misdemeanor  
Mo. Charge Code: 2910199.0  
NCIC Code: 5099

The Grand Jurors of the County of Boone, State of Missouri, charge that Defendant in violation of section 575.060 RSMo, committed the class B misdemeanor of making a false declaration, punishable upon conviction under section 560.021, RSMo, in that on or about June 3, 2009, in the County of Boone, State of Missouri, Defendant acting knowingly in concert with its employees, with the purpose to mislead the Boone County Recorder of Deeds, a public

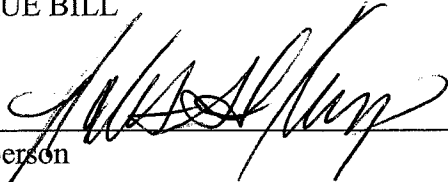
servant in the performance of her duty, submitted or invited reliance on a writing, namely Deed of Release number 2009014721, which Defendant knew to be lacking in authenticity, and which stated a fact material to the purposes for which the writing was offered.

The conduct alleged herein was discovered in 2011, when the purported signer of Deed of Release 2009014721 was found not to have signed Deed of Release 2009014721 before the notary public identified in Deed of Release 2009014721. Defendant is liable under section 562.056(1)(2) RSMo because the conduct constituting the offense was engaged in by an agent of the corporation while acting within the scope of the agent's employment and in behalf of the corporation.

NO TRUE BILL

\_\_\_\_\_  
Foreperson

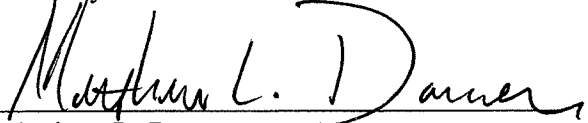
A TRUE BILL

  
\_\_\_\_\_  
Foreperson

Respectfully submitted,

**CHRIS KOSTER**

Attorney General

  
\_\_\_\_\_  
Matthew L. Dameron

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\_\_\_\_\_  
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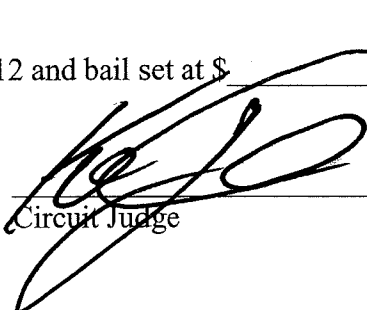
Jefferson City, Missouri 65102

(573) 751-3321

Fax: (573) 751-2041

Special Prosecuting Attorneys

Received and filed on the 3 day of February 2012 and bail set at \$

  
\_\_\_\_\_  
Circuit Judge

*Summons*

Range of Punishment:

Odd-Numbered Counts 1-135 – Class C Felony of Forgery: A fine not to exceed \$10,000.00 or double the gain.

Even-Number Counts 2-136 – Class B Misdemeanor of False Declaration: A fine not to exceed \$2,000.00 or double the gain.

**WITNESS LIST**

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